

Exhibit B

From: Tenreiro, Jorge <tenreiroj@SEC.GOV>
Sent: Wednesday, October 16, 2019 5:13 PM
To: Drylewski, Alexander C (NYC); McGrath, Kevin
Cc: Musoff, Scott D (NYC); Malloy, Christopher P (NYC); Beatty, Andrew R (NYC)
Subject: [Ext] RE: SEC v. Telegram, 19-cv-9439(PKC)(SDNY)
Attachments: 2019.10.16 Proposed PI.docx; 2019.10.16 Telegram Additional Documents subpoena DRAFT.pdf; 2019.10.16 Telegram Subpoena Attachment A.pdf

Hi Alex:

Thanks for your email. (Please copy Daphna on all correspondence).

As we indicated over the phone, we cannot agree to your proposal. Specifically, we will not agree to withdraw our request for a preliminary injunction, nor can we agree that, given the parties' current respective positions, the deadlines for emergency discovery are no longer necessary. We propose that the parties agree to the P.I. on consent, without prejudice to going back to the Court should facts change that require a modification or a lifting of the stay. We are also willing to enter into a proposed expedited discovery schedule as you request. The attached proposal reflects the foregoing.

As stated above, since we do not have agreement, please propose a time to meet and confer on our document requests. We are willing to work with you of course but given the tight deadline of next Thursday, we need the documents by the deadline.

Thanks,

Jorge

From: Drylewski, Alexander C
Sent: Wednesday, October 16, 2019 1:18 PM
To: Tenreiro, Jorge ; McGrath, Kevin
Cc: Musoff, Scott D ; Malloy, Christopher P ; Beatty, Andrew R
Subject: SEC v. Telegram, 19-cv-9439(PKC)(SDNY)

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Hi Jorge and Kevin – as a follow up to our conversations this week, I'm attaching a draft stipulation and proposed order through which Telegram agrees not to offer, sell or distribute any Grams and will preserve relevant documents. We believe this agreement achieves every objective of the SEC's requested preliminary injunction, while preserving the status quo and all parties' rights without asking the Court to engage on the merits at this premature juncture. We hope that the SEC will reconsider its insistence that Defendants consent to entry of a preliminary injunction, which is obviated by the proposed agreement. We're also happy to discuss if you have any proposed edits to the language of the stipulation.

Separately, we'll be sending you later today responses and objections to the SEC's sixteen document requests dated October 11, 2019. We're available to meet and confer regarding these requests, which, as you know, implicate

significant data privacy issues, among others. In light of Telegram's commitment not to offer, sell or distribute Grams and the parties' agreement to work together to set an expedited schedule in this matter, please confirm the SEC's agreement that the deadlines for emergency discovery are no longer necessary as we work through these issues.

Thank you,
Alex

Alexander C. Drylewski
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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

I.

IT IS HEREBY ORDERED that the Commission's application for a preliminary injunction against the Defendants is GRANTED and the preliminary injunction hearing scheduled for October 24, 2019 is ADJOURNED.

II.

IT IS FURTHER ORDERED that, pending a final disposition of this action, Defendants and each of their officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, are preliminary enjoined and restrained from engaging in the offering of unregistered securities or violating Sections 5(a) and 5(c) of the Securities Act, including but not limited to by offering, selling, or distributing the digital tokens known as "Grams" or otherwise by:

- (a) without a registration statement in effect as to that security, making use of the means and instruments of transportation or communications in interstate commerce and of the mails to sell securities through the use of means of a prospectus; and/or
- (b) making use of the means and instruments of transportation or communication in interstate commerce and of the mails to offer to sell through the use of a prospectus, securities as to which no registration statement has been filed.

II.

IT IS FURTHER ORDERED that, pending the final disposition of this action, Defendants **SHALL NOT** destroy, alter, or conceal documents, books, and records that are in their possession, custody, or control, or the possession, custody, or control of each of their respective agents, servants, employees, and attorneys, and those persons in active concert or

participation with them, including documents that concern the allegations in the Complaint or Defendants' assets, finances, or business operations;

III.

IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure 65(d)(2), this Order shall be, and is, binding upon Defendants and each of their respective agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this Order by personal service, facsimile, email, overnight courier, or otherwise.

IV.

IT IS FURTHER ORDERED that the parties shall prepare a proposed Case Management Plan and Scheduling Order ("Case Management Plan"), pursuant to Rule 2 of this Court's Individual Practices, that such Case Management Plan shall provide for expedited discovery to be conducted in advance of a resolution of this action on the merits, and that the parties shall submit the Case Management Plan in advance of the Initial Pretrial Conference to be held before the Court no later than October 31, 2019.

STIPULATED AND AGREED TO:

Date: _____

By: _____

Jorge G. Tenreiro
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Daphna A. Waxman
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New York, New York 10281
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TenreiroJ@sec.gov
*Attorneys for Plaintiff Securities and
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Date: _____

By: _____

George A. Zimmerman
Scott D. Musoff
Christopher P. Malloy
Alexander C. Drylewski
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
Phone: (212) 735-3000

SO ORDERED

Dated: _____, 2019
New York, New York

HON. P. KEVIN CASTEL
UNITED STATES DISTRICT JUDGE

Schedule A

FINANCIAL INSTITUTION	NAME OF ACCOUNT	ACCOUNT NUMBER (Last 4 Digits) OR IDENTIFYING INFORMATION
Bank of America	Middleton, Reginald	XXXXXX3904
Bank of America	Middleton, Reginald	XXXXXX3917
Bank of America	Veritaseum Holdings	XXXXXX1142
Bank of America	Veritaseum Assets LLC	XXXXXX1786
Citibank	221 Washington Avenue LLC	XXX1498
Citibank	281 Cumberland Street LLC	XXX1711
Citibank	Lefferts Place LLC	XXX1404
Citibank	Middleton, Reginald	XXX1630
Citibank	Reggie Middleton LLC	XXX1201
Citibank	Veritaseum Inc.	XXXXXX4865
Citibank	Veritaseum LLC	XXXXXX2142
JPMC	Middleton, Reginald	XXXXXX7843
JPMC	Veritaseum LLC	XXXXXX5610
Kraken	Veritaseum, LLC	XXXXXX5A7Q
Gemini		Account ID ending in 5247
Coinbase		User IDs ending in 00e3c & 00053a
Interactive Brokers	Veritaseum Assets, LLC	XXXXXX0423
Afrasia Bank (Mauritius)	Veritaseum PanAfrica Holdings	
Barclays Bank	Veritaseum	

(Mauritius)	PanAfrica Holdings	
Guaranty Trust Bank (Nigeria)	Veritaseum PanAfrica	
Access Bank (Nigeria)	Veritaseum PanAfrica	
Zenith Bank (Nigeria)	Veritaseum PanAfrica	
Ethereum Blockchain Address		0x2cc2720ec4263ca730e6209348673665939c29e2
Ethereum Blockchain Address		0x599a4b8188676224d4c9b393b947e332b60b15e3
Ethereum Blockchain Address		0x82c48875c17ee5812f909a9d75c0f64f7a8719fe
Ethereum Blockchain Address		0x7dad3795a4681cd34c673abbdde0257c3be7f231
Ethereum Blockchain Address		0x47afae2eb056630dbde374cc7e79c69d9120c372
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Ethereum Blockchain Address		0xd2b87eb4418f07fe2c65800ee0db995e8caef3b3
Ethereum Blockchain Address		0xeeaf0b2dbbf6d0a7de0e0668a1c97ba7f3098840
Ethereum Blockchain		0x3f6caf49da88ca2452b1f8ad5b710db7141e48a8

Address		
Ethereum Blockchain Address		0x2483b897720a1ff105675ba04f6e1c46cd903ec2
Ethereum Blockchain Address		0x67bb19d5a4f1b9939178d92a09d62444e4a76438
Ethereum Blockchain Address		0xD7479145E52aDc22e6c4DC2c6809a69716823f42
Ethereum Blockchain Address		0xA64983B89345AEa760Ec122f1DDA463EDc9100BF
Ethereum Blockchain Address		0x95841340a779363E9329ed5019E72A05989fd304
Ethereum Blockchain Address		0x75C526d5143792446E0837B5ac84f17576dd76B1
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Ethereum Blockchain Address		0xe8916277B0953034F085d4f6fA4DaFb89E003492
Ethereum Blockchain Address		0x4D9471136B8569aE7EF7F6D5ae2a48aC1b12e33F
Ethereum Blockchain Address		0x3f6caf49da88ca2452b1f8ad5b710db7141e48a8
Bitcoin Blockchain Address		1Jn6XJtCURCAyEx328Ddn7njAcqKJ21CbJ
Bitcoin Blockchain Address		1DxueK11gJCFpswAM2P6tTC2pgz1gXZfCc
Bitcoin Blockchain Address		14ioyNTzBQY9kqK6WzM6eeyqWfJrtM2W7W
Bitcoin Blockchain Address		1L2yn1oubhnVHze7vajFxctBor5NFk2Upy
Bitcoin Blockchain Address		13eFTG5BZirH4WzMhPWDt9YjkDDezz7nke
Bitcoin Blockchain Address		19tL87qf8DaiQmtyBZFZoDDrSLQpLFJcd7

Bitcoin Blockchain Address		16obZYxWffrEifadq9L9K9rEaDEPsK11eH
Bitcoin Blockchain Address		155Jpk9qqak7sMnE2bgkpcrU4wUxeRfguD
Bitcoin Blockchain Address		14M1F4VRvxHJGCmNEixnMwtfSjwGdC2BHz